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December 3, 2019

VIA ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007
(212) 805-0282

Re: *Bromfield-Thompson v. American University of Antigua, et al.*,
Civil Action No. 19-CV-6078 (JMF) (S.D.N.Y.)

Dear Judge Furman:

This firm is counsel to American University of Antigua (“AUA”) and Manipal Education Americas, LLC (“MEA”) in the above-referenced matter. I am writing to request the Court’s permission to file a memorandum of law, in support of AUA’s and MEA’s upcoming joint motion to dismiss the Complaint, that exceeds the 25-page limitation on memoranda.

AUA and MEA are required to answer or move to dismiss the Complaint in this action by December 9, 2019. Both parties intend to seek dismissal. Although AUA and MEA have some arguments that are common to both, their grounds for seeking dismissal do not overlap completely. We would prefer to file a single memorandum to avoid duplication of similar arguments, but are unable to do so within the 25-page limitation under Your Honor’s Individual Rules. Accordingly, we respectfully request that the Court permit us to file a joint memorandum of law on behalf of AUA and MEA consisting of up to 35 pages.

Respectfully submitted,



Robb W. Patryk

cc: All Counsel of Record (via ECF)